

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:24-cv-00221-TDS-LPA

CRAIG CUNNINGHAM, )  
                        )  
Plaintiff,           )  
                        )  
v.                    )  
                        )  
WALLACE & GRAHAM, P.A., MONA )  
LISA WALLACE, BILL GRAHAM,   )  
WHITNEY WALLACE WILLIAMS,   )  
MARK P. DOBY, RHINE LAW FIRM, )  
P.C., JOEL R. RHINE, SOKOLOVE )  
LAW, LLC, and RICKY A. LEBLANC, )  
                        )  
Defendants.          )

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO COMPLAINT**  
**(Fed. R. Civ. P. 6(b)(1)(A))**

Defendants, Wallace & Graham, P.A., Mona Lisa Wallace, Bill Graham, Whitney Wallace Williams, Mark P. Doby, Rhine Law Firm, P.C., Joel R. Rhine, Sokolove Law, LLC, and Ricky A. LeBlanc, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LR 7.1 and through counsel, without waiving any defenses including without limitation for insufficient process, insufficient service of process, and lack of personal jurisdiction, hereby respectfully move the Court for a 21-day extension of time in which to respond to the Complaint in this matter filed by the Plaintiff Craig Cunningham and show:

1. The complaint was filed on March 12, 2024. Doc. 1.

2. One or more of the above-named Defendants have as of the date of this filing not been formally served with process.

3. No Defendant was served before March 18, 2024.

4. As such, the time for any of the named Defendants to file a response to the Complaint has not yet expired under Fed. R. Civ. P. 12.

5. Defendants are in need of additional time to review the complaint and investigate the matter.

6. In accordance with Local Rule 6.1(a), the undersigned counsel has consulted with counsel for Plaintiff regarding this motion. Counsel for Plaintiff does not oppose the relief requested herein.

Wherefore, the Defendants respectfully request that the Court allow them an additional 21 days through and including April 29, 2024, by which to file their response to the Complaint.

This 5th day of April, 2024.

Respectfully submitted,

/s/ Matthew Nis Leerberg  
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